

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

PETER PEDERSEN  
Plaintiff,

v.

ZOHO CORPORATION,  
Defendant

Civil Action No. 6:22-cv-00408-ADA

**CASE READINESS STATUS REPORT**

Plaintiff Peter Pedersen (“Pedersen” or “Plaintiff”) and Zoho Corporation (“Zoho” or “Defendant”), hereby provide the following Case Readiness Status Report in accordance with the Court’s September 16, 2022 Standing Order.

**SCHEDULE**

A scheduling order has not yet been filed. A *Markman* date and trial date are not yet proposed.

**FILING AND EXTENSIONS**

Plaintiff’s Complaint for Patent Infringement (ECF No. 1) was filed on April 22, 2022.

**RESPONSE TO THE COMPLAINT**

Defendant filed a Motion to Dismiss Pursuant to Federal Rule of Civil Procedure 12(B)(6) (ECF No. 6) on September 26, 2022.

**PENDING MOTIONS**

Defendant’s Motion to Dismiss Pursuant to Federal Rule of Civil Procedure 12(B)(6) (ECF No. 6) is currently pending before this Court.

**RELATED CASES IN THIS JUDICIAL DISTRICT**

The following related cases were each filed on April 22, 2022, in the Western District of Texas and share at least one common asserted patent:

1. *Pedersen v. Oracle Corp.*, Case No. 6:22-cv-00410-ADA; and
2. *Pedersen v. Salesforce.com, Inc.*, Case No. 6:22-cv-00409-ADA.

**IPR, CBM, AND OTHER PGR FILINGS**

There are no known IPR, CBM, or other PGR filings.

**NUMBER OF ASSERTED PATENTS AND CLAIMS**

Plaintiff has asserted at least claim 1 of U.S. Patent No. 6,965,920.

**APPOINTMENT OF TECHNICAL ADVISER**

None at this time.

**MEET AND CONFER STATUS**

Plaintiff and Defendant met and conferred on October 4, 2022. With the exception of Defendant's Motion to Dismiss Pursuant to Federal Rule of Civil Procedure 12(B)(6), the parties have no pre-Markman issues to raise at the CMC.

Dated: October 4, 2022

/s/ William P. Ramey, III  
William P. Ramey, III  
Texas Bar No. 24027643  
**Ramey LLP**  
5020 Montrose Blvd., Suite 800  
Houston, Texas 77006  
(713) 426-3923 (telephone)  
(832) 900-4941 (fax)  
wramey@rameyfirm.com

**COUNSEL FOR PLAINTIFF**

Respectfully submitted,

/s/ Ryan J. Marton  
Darryl J. Adams  
Texas State Bar No. 00796101  
dadams@sgbfirm.com  
**SLAYDEN GRUBERT BEARD PLLC**  
401 Congress Avenue, Suite 1650  
Austin, Texas 78701  
Telephone: (512) 402-3550  
Facsimile: (512) 402-6865

Ryan J. Marton (admitted *Pro Hac Vice*)  
ryan@martonribera.com  
Phillip Haack (*Pro Hac Vice* to be filed)  
phaack@martonribera.com  
Shannon Kumagai (admitted *Pro Hac Vice*)  
shannon@martonribera.com  
**MARTON RIBERA SCHUMANN & CHANG LLP**  
548 Market St., Suite 36117  
San Francisco, CA 94104  
Telephone: (415) 360-2515

**COUNSEL FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing is being served on the counsel of record via the CM/ECF system on October 4, 2022.

*/s/ William P. Ramey, III*  
William P. Ramey, III